

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

NEW WORLD MONTESSORI SCHOOL,

Plaintiff,

v.

THE UNITED STATES OF AMERICA

Defendant.

No. 24-cv-00322-DCG

Joint Report Concerning Settlement Negotiations

Pursuant to Dkt. 24, the Parties submit this Joint Report Concerning Settlement Negotiations.

1. **Identity of the Person Responsible for Settlement Negotiations for Each Party.**

- New World Montessori School: Francisco Portillo
- United States of America: Christian Orozco

2. **Alternative Dispute Resolution.** The Parties currently do not believe that alternative dispute resolution is necessary but will revisit potential ADR options, if necessary.

3. **Settlement Status.** Counsel for the Parties met and conferred by Zoom on Friday, February 28, 2025 concerning this Joint Report and settlement. On the same day, New World Montessori School provided responses to the United States's First Set of Interrogatories and First Requests for Production. The government is currently reviewing the information that New World Montessori provided.

Before April 4, 2025, counsel for New World Montessori and counsel for the United States will meet and confer to discuss the United States's ongoing review of New World Montessori's materials and potential settlement of the case.

Pursuant to Dkt. 24, New World Montessori will provide a settlement demand to the United States on or before April 4, 2025.

Dated: March 4, 2025

/s/ Weston O'Black
Justin A. Nelson
Weston O'Black (*pro hac vice*)
Daniel Wilson
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, TX 77002
Tel.: 713-651-9366
jnelson@susmangodfrey.com
woblack@susmangodfrey.com
dwilson@susmangodfrey.com

S. Anthony Safi
Mounce, Green, Myers,
Safi, Paxon & Galatzan, PC
100 N. Stanton, Suite 1000
El Paso, TX 79901
Tel: 915-532-2000 ext. 542
safi@mgmsg.com

***Attorneys for Plaintiff New World Montessori
School***

/s/ Christian Orozco
Christian A. Orozco
U.S. DEPARTMENT OF JUSTICE
1700 Pacific Avenue, Suite 3700
Dallas, Texas 75201
Phone: 214-880-9757
Fax: 214-880-9741
Christian.A.Orozco@usdoj.gov

Attorney for the United States of America

CERTIFICATE OF SERVICE

This is to certify that on March 4, 2025, I served the foregoing document by filing it through CM/ECF.

/s/ *Weston O'Black*
Weston O'Black
SUSMAN GODFREY LLP